

## **STATUS OF CLAIMS**

Claims 2-46 are pending.

Claims 2-46 stand rejected.

Claims 2, 4, 10-14, 16-21, 26-27 and 33-45 have been amended without prejudice.

## **REMARKS**

Claims 2-10, 22 and 25-33 stand rejected under U.S.C. § 102(e) as being anticipated by Comstock (U.S. Patent Application Publication No. 2004/0083266). Claims 11-21, 23-24, 32, and 34-46 stand rejected under U.S.C. § 103(a) as being unpatentable over Comstock in view of Paz (U.S. Patent Application Publication No. 2004/0205213). Applicant requests reconsideration and removal of these rejections for at least the following reasons.

### **1. Claims 2-3 and 5-26**

As set forth above, Claim 2 stands rejected as being anticipated by Comstock. Applicant requests reconsideration and removal of this rejection for at least the following reasons.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *See, M.P.E.P. §2131 citing Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).* In other words, in order for a prior art reference to anticipate a claim, "the identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).* And, each of the claim elements must be arranged as required by the claim. *See, In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).* Comstock fails to teach each of the limitations of present Claim 2, such that it fails to anticipate Claim 2 as a matter of law.

More particularly, embodiments of the present invention may be used to provide an improved video digitizer capable of rapidly adjusting the video signal when a user

switches from one remote computer to another. *See, specification as filed, p. 19, ll. 14-19.* Such embodiments may also be capable of correcting many problems associated with video transmission in KVM switches, such as phase shift adjustments and video mode detection. *See, Id.*

In certain embodiments of the present invention, and to transmit digitized video from the RMU to the user workstation, an A/D converter, and much of its associated circuitry, is replaced with a Liquid Crystal Display ("LCD") controller. *See, e.g., specification as filed, p. 21, ll. 1-16.* Internal functions built into the LCD controller may be applied to common KVM switch problems. *See, Id.* For example, some of these functions include video mode detection, auto-adjustment support for sampling phase and frequency, picture alignment, color alignment, color adjustment, upscaling/downscaling, and image position. *See, Id.* By utilizing an LCD controller, embodiments of the present invention provide a more efficient and simpler method for designing and implementing KVM switches. *See, Id.*

Consistently, Claim 2 has been amended to broadly recite:

A system for improved video digitization and image correction, said system comprising:  
a plurality of workstations coupled to a communications medium; and  
a remote management unit coupled to said communications medium, said remote management unit including an LCD controller converting analog video signals received from at least one of a plurality of remote networking devices to image correction processed digital video signals, the remote management unit including modules for processing and transmitting control signals to and from the plurality of workstations and transmitting the image correction processed digital signals to the plurality of workstations.

Accordingly, no new matter has been entered by the amendment of Claim 2. *See again, e.g., specification as filed, p. 21, ll. 1-16.*

Comstock fails to address KVM switch problems at all, no less teach the LCD controller incorporating RMU proposed in certain embodiments of the present invention and recited by Claim 2.

More particularly, Claim 2 calls for, *inter alia*: (1) a remote management unit (RMU) coupled to a communications medium, in-turn coupled to a plurality of

workstations; (2) the RMU to include an LCD controller that converts analog video signals received from at least one of a plurality of remote networking devices to image correction processed digital video signals; and (3) the remote management unit to include modules for transmitting the image correction processed digital signals to the plurality of workstations.

Comstock fails to teach, or even suggest for that matter, such an RMU. The Office action argues Comstock teaches the recited RMU of Claim 2 in Fig. 2 and at pars. 0030-0032 and 0035-0034 [sic]. See, 7/3/2007 Office action, par. 11, ll. 4-7. However, Fig. 2 of Comstock fails to evidence any LCD controller at all. Further, Applicant's review of Comstock in its entirety has failed to uncover even a single occurrence of LCD or liquid crystal display, no less such a controller.

For purposes of completeness, Applicant's notes that the teachings of Paz are similarly deficient, at least by virtue that Applicant's review thereof in its entirety has also failed to uncover even a single occurrence of LCD or liquid crystal display, no less such a controller.

For purposes of yet further completeness, it may also be noted that the recited LCD controller of Claim 2 is not being used in a conventional manner -- e.g., to drive a locally connected LCD panel. Rather, the recited LCD controller of Claim 2 serves to convert analog video signals received from at least one of a plurality of remote networking devices to image correction processed digital video signals; where the image correction processed digital signals are transmitted to a plurality of workstations.

Accordingly, Applicant requests reconsideration and removal of the rejection of Claim 2 as being anticipated by Comstock, at least by virtue that Comstock fails to teach, at least: a remote management unit coupled to said communications medium, **said remote management unit including an LCD controller** converting analog video signals received from at least one of a plurality of remote networking devices to image correction processed digital video signals, the remote management unit including modules for processing and transmitting control signals to and from the plurality of workstations and transmitting the image correction processed digital signals to the plurality of workstations -- as is recited by Claim 2.

Claims 10-14, 16-21 and 26 have been amended consistently with Claim 2. Accordingly, no new matter has been added by the amendments thereto. Claims 3 and

5-26 each ultimately depend from base Claim 2. Applicant thus also requests reconsideration and removal of the rejections of Claims 3 and 5-26 as well, at least by virtue of these claims' ultimate dependency upon a patentably distinct base Claim 2.

## **2. Claim 4**

As set forth above, Claim 4 stands rejected as being anticipated by Comstock. Applicant requests reconsideration and removal of this rejection for at least the following reasons.

Claim 4 has been rewritten in independent form. Accordingly, no new matter has been added by the amendment thereof. Claim 4 recites, *inter alia*, "wherein said remote management unit controls a power supply for each of said remote networking devices." The Office action argues Comstock teaches that a RMU controls a power supply of the remote networking devices at pars. 0022-0024. However, a review of these paragraphs of Comstock clearly reveals there is no mention therein, what-so-ever, of any remote power control of network devices at all -- no less of an RMU controlling the power of remote networking devices.

Rather, paragraph 0022 merely discusses possible physical realizations. Paragraph 0023 discusses teleconference standards that can be utilized. And, paragraph 0024 discusses that a gateway translates data between PSTN 60 and Internet 80.

Accordingly, Applicant requests reconsideration and removal of the rejection of Claim 4 as well, at least by virtue that Comstock fails to teach, or even suggest for that matter, that the remote management unit controls a power supply for each of the remote networking devices.

## **3. Claims 27-46.**

As also set forth above, Claim 27 stands rejected as being anticipated by Comstock. Applicant requests reconsideration and removal of the rejection thereof for at least reasons analogous to those set forth above with regard to Claim 2.

More particularly, Claim 27 has been amended analogously to Claim 2 to recite:

A method for providing improved video digitization and image correction for the transmission of video signals, said method comprising the steps of:

receiving analog video signals and control signals from one of a plurality of remote devices connected to a remote management unit;

**using an LCD controller** to convert said analog video signals to digital video signals and correct said digital video signals; and

transmitting said digital video signals and the control signals to one of a plurality of user interface devices.

Accordingly, no new matter has been added.

Further, Applicant requests reconsideration and removal of the rejection of Claim 27 as being anticipated by Comstock, at least by virtue that Comstock fails to teach, at least: **using an LCD controller** to convert said analog video signals to digital video signals and correct said digital video signals -- as is recited by Claim 27.

Claims 33-45 have been amended consistently with Claim 27. Claims 28-46 each ultimately depend from base Claim 27. Applicant thus also requests reconsideration and removal of the rejections of Claims 28-46 as well, at least by virtue of these claims' ultimate dependency upon a patentably distinct base Claim 27.

## **CONCLUSION**

Wherefore, Applicant believes he has addressed all outstanding grounds raised by the Examiner and respectfully submits the present case is in condition for allowance, early notification of which is earnestly solicited.

Should there be any questions or outstanding matters, the Examiner is cordially invited and requested to contact Applicant's undersigned attorney at his number listed below.

**CORRESPONDENCE AND FEES**

No additional fees are believed to be necessitated by the instant response. However, should this be in error, authorization is hereby given to charge Deposit Account no. 03-3839 for any underpayment, or to credit any overpayments.

Please address all correspondence to the correspondent address for **Customer No. 26345** of Intellectual Docket Administrator, Gibbons P.C., One Gateway Center, Newark, NJ 07102. Telephone calls should be made to Abhik A. Huq at (215) 446-6268 and fax communications should be sent directly to him at 215-446-6309.

Respectfully submitted,

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